

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

14 FEB -7 PM 3:10

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Case No.

1:14MJ-091

Express Mail parcel label number EI214352294US, postmarked
January 29, 2014, weighing 8 pounds 4 ounces, addressed to Karen
White, 66 Gambier Circle, Greenhills, Ohio 45218 with a return
address of Kevin Sullivan, 440 Laguna Dr, Rohnert Park, CA 94928

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Express Mail parcel label number EI214352294US

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

Controlled Substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments paid for controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of: Title 21

Code Section	Offense Description
841 (a) (1), 843 (b) & 846	Conspiracy to distribute a controlled substance
	Possession with intent to distribute a controlled substance

The application is based on these facts:

See attached affidavit of U.S. Postal Inspector O'Neill

- ☒ Continued on the attached sheet.
☐ Delayed notice _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Karen L. O'Neill, U. S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/7/14



Judge's signature

City and state: Cincinnati, Ohio

Honorable Karen L. Litkovitz
United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI, OHIO

STATE OF OHIO)
) SS
COUNTY OF HAMILTON)

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, KAREN O'NEILL, HAVING BEEN DULY SWORN, DEPOSE AND STATE: I am a United States Postal Inspector, having been so employed since March 2003. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for Southwest Ohio, Northern Kentucky, and Southeast Indiana. Part of my investigative responsibility involves the use of the United States Mail in the transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.

Your affiant has become aware that drug traffickers frequently use Express Mail, a business-oriented overnight service offered by the United States Postal Service, to transport narcotics and other dangerous controlled substances, and their proceeds or instrumentalities from the sale of the controlled substances. Your affiant has also become aware that drug traffickers frequently use Priority Mail with delivery confirmation, a 2-3 day service offered by the United States Postal Service. As a result of investigations and successful controlled substance prosecutions where the Mail was used, your affiant has learned of certain characteristics indicative of other Mail items previously identified as containing narcotics or other dangerous controlled substances, their proceeds or instrumentalities from the sale of the controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion, the mailer using different post offices on the same day to send parcels, false or non-existent return address, addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

On January 30, 2014, your affiant requested a check in the postal product tracking system for parcels going to southern Ohio. Express Mail parcel label number EI214352294US was located going to Cincinnati, Ohio coming from northern California; a known drug source area.

On January 30, 2014, your affiant contacted the Parkdale Post Office, Cincinnati, Ohio and requested to be contacted when the parcel arrived for delivery.

On January 30, 2014, your affiant was contacted by the manager of the Parkdale Post Office regarding Express Mail parcel label number EI214352294US. The parcel is addressed to Karen White, 66 Gambier Circle, Greenhills, Ohio 45218 with a return address of Kevin Sullivan, 440 Laguna Dr, Rohnert Park, CA 94928. Your affiant requested the parcel be placed in a secure location for further investigation.

On January 30, 2014, your affiant requested a check in Accurint regarding the return address 440 Laguna Dr, Rohnert Park, CA 94928. Accurint is a law enforcement database that is used as a tool for investigators to identify person/business and address information. According to Accurint, the name "Sullivan" is not associated with that address.

On January 30, 2014, your affiant requested a check in Accurint regarding the addressee address 66 Gambier Circle, Greenhills, Ohio 45218. According to Accurint, the name "White" is not associated with that address.

On January 31, 2014, your affiant obtained the aforementioned parcel from the Parkdale Post Office. Your affiant learned from the manager that the addressee address 66 Gambier Circle has been vacant for more than a year.

On February 5, 2014, the Cincinnati Police Department Narcotics Unit was contacted to arrange for a narcotic canine to check the parcel. Officer Sean Woods responded to the Cincinnati Postal Inspection Service office, Cincinnati, Ohio where the parcel was placed in a controlled area and presented to narcotic

canine, "Dozer". "Dozer" alerted positively to the presence or odor of a controlled substance or their proceeds or instrumentalities upon Express Mail parcel label number EI214352294US addressed to Karen White, 66 Gambier Circle, Greenhills, Ohio 45218. Attached herewith, and made part hereof by reference, is a photocopy of the narcotic canine handler's record of examination.

The parcel is further identified as follows: a brown cardboard box 14" x 14" x 14" in size, bearing Express Mail parcel label number EI214352294US, weighing 8 pounds 4 ounces, postmarked January 29, 2014; see address information below:

Sender: Kevin Sullivan
440 Laguna Dr
Rohnert Park, CA 94928

Addressee: Karen White
66 Gambier Circle
Greenhills, Ohio 45218

This information, along with the positive alert of narcotic canine "Dozer" is indicative of a drug package or its proceeds.

Based on the information contained herein, your affiant believes that contained in Express Mail parcel label number EI214352294US is a quantity of a narcotic or other dangerous controlled substance, their proceeds or instrumentalities.

Therefore, a search warrant to open the parcel is requested.

Further, your affiant sayeth naught.

A handwritten signature in blue ink, appearing to read "K O'Neill", written over a horizontal line.

Karen O'Neill
Postal Inspector

Subscribed and sworn to and before me this 7 day of Feb., 2014.

A handwritten signature in blue ink, appearing to read "Karen L. Litkovitz", written over a horizontal line.

Honorable Karen L. Litkovitz
United States Magistrate Judge



United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

I, Officer SEAN M. WOODS, am and have been employed by
the CINCINNATI POLICE DEPT since 1/00. Among other duties, I am
currently the assigned handler of narcotics detection canine "Dozer" which
is trained and certified in the detection of the presence or odor of narcotics described as follows:
MARIJUANA, METH, COCAINE, HEROIN

On 2-5-14, at the request of Postal Inspector K. O'Neill, I responded to
Cincy Post Office Insp office, where "Dozer" did alert to and

indicate upon: [describe item]

EI 21438229405 16cm white 66 Camber Circle
Greenhills Ohio 45488 Kevin Sullivan 440 Lepore
Rehner Park CA 64628

Which, based upon my training and experience and that of "Dozer", indicates
there is contained within or upon the above described item, the presence or odor of a narcotic or
other controlled substance.

[Signature] 2-5-14
(Signature and Date)

[Signature] 2-5-14
(Signature and Date)